

**IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT
OF TEXAS MARSHALL DIVISION**

**OPTIS WIRELESS TECHNOLOGY, LLC AND
PANOPTIS PATENT MANAGEMENT, LLC,**

Plaintiffs,

v.

BLACKBERRY LIMITED, et al.,

Defendants.

**Civ. A. No. 2:16-cv-62-JRG-RSP
(Lead Case)**

JURY TRIAL REQUESTED

**JOINT MOTION TO STAY ALL DEADLINES AND
NOTICE OF SETTLEMENT**

Plaintiffs Optis Wireless Technology, LLC and PanOptis Patent Management, LLC (collectively, “PanOptis”) and Defendants BlackBerry Limited and BlackBerry Corporation (collectively, “BlackBerry”) jointly state that all matters in controversy between the parties have been settled, in principle, and respectfully request that the Court stay all unreached deadlines in the Court’s Docket Control Order for 30 days until April 12, 2017, so that appropriate dismissal papers may be submitted after the final agreement has been executed. There is good cause to stay all deadlines in view of the settlement agreement in principle. A proposed order is attached.

March 10, 2017

Respectfully submitted,
/s/Eric S. Tautfest

J. Cary Gray (Lead Counsel for PPM)
Texas Bar No. 08322300
cgray@grayreed.com
James Ormiston
Texas Bar. No. 15307500
jormiston@grayreed.com
Michael Ellis
Texas Bar No. 24081586
mellis@grayreed.com
GRAY REED & MCGRAW, P.C.
1300 Post Oak Blvd., Suite 2000
Houston, TX 77056
Telephone: (713) 986-7000
Facsimile: (713) 986-7100

Eric S. Tautfest
Texas Bar No. 24028534
etautfest@grayreed.com
Jared Hoggan
Texas Bar No. 24065435
jhoggan@grayreed.com
David T. DeZern
Texas Bar. No. 24059677
ddezern@grayreed.com
M. Jill Bindler
Texas Bar No. 02319600
jbindler@grayreed.com
David Lisch
Texas Bar No. 24077179
dlisch@grayreed.com
GRAY REED & MCGRAW, P.C.
1601 Elm Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 954-4135
Facsimile: (469) 320-6901

Eric M. Albritton (Lead Counsel for Optis
Wireless)
Texas Bar No. 00790215
ema@emafirm.com
Shawn A. Latchford

Respectfully submitted,
/s/ Eric Huang (with permission)

E. Leon Carter
Texas State Bar No. 03914300
lcarter@carterscholer.com
John S. Torkelson
Texas State Bar No. 00795154
jtorkelson@carterscholer.com
CARTER SCHOLER ARNETT HAMADA &
MOCKLER PLLC
8150 N. Central Expressway
Suite 500
Dallas, TX 75206
Tel: 214-550-8188
Fax: 214-550-8185

James R. Asperger (*pro hac vice*)
jimasperger@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Kevin P.B. Johnson (*pro hac vice*)
kevinjohnson@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: 650-801-5000
Facsimile: 650-801-5100

Eric Hui-chieh Huang (*pro hac vice*)
erichuang@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: 212-849-7000
ATTORNEYS FOR DEFENDANTS

Texas State Bar No. 24066603
sal@emafirm.com

Albritton Law Firm

PO Box 2649

Longview, TX 75606

Telephone: (903) 757-8449

Facsimile: (903) 758-7397

**BLACKBERRY LIMITED &
BLACKBERRY CORP.**

ATTORNEYS FOR PLAINTIFFS

PanOptis Patent Management, LLC

and Optis Wireless Technology, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed via CM/ECF on March 10, 2017, and was served upon all counsel of record via CM/ECF.

/s/Eric S. Tautfest